

1 Andrew A Bao, Esq.  
2 Nevada Bar No. 10508  
3 *aabao@wolfewyman.com*  
4 WOLFE & WYMAN LLP  
5 980 Kelly Johnson Drive, Suite 140  
6 Las Vegas, Nevada 89119  
7 Telephone: (702) 476-0100  
8 Facsimile: (702) 476-0101

9 Attorneys for Defendant  
10 PNC BANK, N.A., dba PNC Mortgage

11 UNITED STATES DISTRICT COURT  
12 DISTRICT OF NEVADA

13 LUZ AQUINO,  
14 Plaintiff,  
15 v.  
16 PNC MORTGAGE; CLEAR RECON CORP.,  
17 Defendants.

Case No.: 2:15-cv-00068 GMN GWF

**REQUEST FOR JUDICIAL NOTICE  
IN SUPPORT OF MOTION FOR  
ATTORNEYS' FEES SUBMITTED BY  
PNC BANK, N.A.**

Action Filed: 01/13/2015  
Trial Date: None set.

18  
19  
20 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

21 Pursuant to Rule 201 of the Federal Rules of Evidence, Defendant PNC BANK, N.A., dba  
22 PNC Mortgage ("PNC") hereby requests the Court take judicial notice of the following documents in  
23 support of PNC's motion for attorney fees in this matter.

24 1. Deed of Full Reconveyance, Inst# 201106100002520 recorded on June 10, 2011 in  
25 the Clark County Recorder, a true and correct copy of which is attached as **Exhibit 1**.

26 ///

27 ///

28 ///



2. Rescission of Fraudulent Reconveyance, Inst# 201310030001821 recorded on  
October 3, 2013 in the Clark County Recorder, a true and correct copy of which is attached as  
**Exhibit 2.**

DATED: November 6, 2015

WOLFE & WYMAN LLP

By: /s/ Andrew A. Bao SBN 10508

Andrew A Bao, Esq.  
Nevada Bar No. 10508  
*aabao@wolfewyman.com*  
WOLFE & WYMAN LLP  
980 Kelly Johnson Drive, Suite 140  
Las Vegas, Nevada 89119  
Telephone: (702) 476-0100  
Facsimile: (702) 476-0101  
Attorneys for Defendant  
**PNC BANK, N.A. dba PNC Mortgage**

WOLFE & WYMAN LLP  
ATTORNEYS & COUNSELORS AT LAW



**PROOF OF SERVICE**

**STATE OF CALIFORNIA**

**COUNTY OF ORANGE**

) )  
ss.

I, Kathy Hagmaier, declare: I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 2301 Dupont Drive, Suite 300, Irvine, California 92612-7531.

On the date shown below, I served the document(s) described as **REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF MOTION FOR ATTORNEYS' FEES SUBMITTED BY PNC BANK, N.A.** on all interested parties in said action by placing a true copy thereof in a sealed envelope addressed as stated on the ATTACHED SERVICE LIST.

☒ **BY MAIL:** as follows:

☐ **STATE** - I am "readily familiar" with Wolfe & Wyman LLP's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Irvine, California, in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one (1) day after date of deposit for mailing in affidavit.

☒ **FEDERAL** - I deposited such envelope in the U.S. Mail at Irvine, California, with postage thereon fully prepaid.

☐ **BY PERSONAL SERVICE** as follows: I caused a copy of such document(s) to be delivered by hand to the offices of the addressee between the hours of 9:00 A.M. and 5:00 P.M.

☐ **BY OVERNIGHT COURIER SERVICE** as follows: I caused such envelope to be delivered by overnight courier service to the offices of the addressee. The envelope was deposited in or with a facility regularly maintained by the overnight courier service with delivery fees paid or provided for.

☒ **BY ELECTRONIC MAIL** as follows: I hereby certify that I electronically transmitted the attached document(s) to the U.S. District Court using the CM/ECF System for filing, service and transmittal of Notice of Electronic Filing to the CM/ECF registrants for this case. Upon completion of the electronic transmission of said document(s), a receipt is issued to the serving party acknowledging receipt by ECF's system, which will be maintained with the original document(s) in our office.

☐ **BY FACSIMILE** as follows: I caused such documents to be transmitted to the telephone number of the addressee listed on the attached service list, by use of facsimile machine telephone number. The facsimile machine used complied with California Rules of Court, Rule 2004 and no error was reported by the machine. Pursuant to California Rules of Court, Rule 2006(d), a transmission record of the transmission was printed.

☐ **STATE** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☒ **FEDERAL** I declare that I am employed in the offices of a member of the State Bar of this Court at whose direction the service was made.

Executed on November 6, 2015, at Irvine, California.

  
Kathy Hagmaier

WOLFE & WYMAN LLP  
ATTORNEYS & COUNSELORS AT LAW



**SERVICE LIST****U.S. District Court, District of Nevada – Case No. 2:15-cv-00068 GMN GWF****Luz Aquino v. PNC Mortgage, et al.****W&W File No. 1264-656****[Revised: 06/15/15]**

Luz Aquino  
395 Wigwam Avenue  
Las Vegas, NV 89123

**PLAINTIFF PRO SE**  
Tel.: (702) 250-0388  
Fax:  
Email:

Laurel I. Handley, Esq.  
Mara E. Satterthwaite, Esq.  
ALDRIDGE PITE, LLP  
520 South 4th Street, Suite 360  
Las Vegas, NV 89101

**Attorneys for Defendant**  
**CLEAR RECON CORP.**  
Tel.: (858) 750-7600  
Fax: (702) 685-6342  
Email: lhandley@piteduncan.com

**WOLFE & WYMAN LLP**  
ATTORNEYS & COUNSELORS AT LAW

